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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

JANE DOE, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

PHE, INC. and GOOGLE LLC

Defendants.

Case No. 2:24-cv-01065-RGK-SKx

[Los Angeles County Superior Court Case
No. 24STCV00181]

**JOINT RESPONSE TO ORDER TO
SHOW CAUSE RE DISMISSAL FOR
LACK OF PROSECUTION**

CLASS ACTION

Action Filed: January 3, 2024

Removal: February 7, 2024

1 Plaintiff and Defendants PHE, Inc., and Google LLC (together, the “Parties”)
2 submit this joint response to the Court’s Order to Show Cause at ECF No. 18.

3 Plaintiff filed this action in Los Angeles Superior Court on January 3, 2024, and
4 Defendant Google removed the action to this Court on February 7, 2024. (ECF Nos.
5 1, 1-1). Prior the removal, the Parties had a meet and confer on January 26, 2024,
6 during which Google informed Plaintiff of its intention to file a notice of removal,
7 and Plaintiff informed Defendants of her intention to file a motion to remand. In the
8 interests of judicial economy, the Parties agreed that Defendants’ response to the
9 complaint will be extended to 30 days after the Court issues a decision on Plaintiff’s
10 motion to remand so that the jurisdictional question posed by the motion to remand
11 could be resolved first.

12 The Parties have been negotiating a briefing schedule for the motion to remand
13 in parallel and have concurrently submitted a stipulation on a briefing schedule for
14 the motion to remand and an extension of time to respond to the complaint.

15
16 Dated: February 16, 2024

WILLKIE FARR & GALLAGHER LLP

17 By: /s/ Benedict Y. Hur

18 Benedict Y. Hur

19 Simona Agnolucci

20 Yuhan Alice Chi

21 *Attorneys for Defendant*

22 *Google LLC*

1 Dated: February 16, 2024

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FILER'S ATTESTATION

Pursuant to Local Rule 5-4.3.4(a)(2), the filer hereby attests that all other signatories to this document concur in the content of, and have authorized, this filing.

Dated: February 16, 2024

/s/ Benedict Y. Hur

Benedict Y. Hur

*Attorneys for Defendant
Google LLC*